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*Company, Ltd., and Pangang Group International Economic & Trading Company*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) CASE NO. 4:11-CR-00573-07-10 JSW  
Plaintiff, )  
v. ) JOINT STATUS REPORT  
PANGANG GROUP COMPANY, LTD.; )  
PANGANG GROUP STEEL VANADIUM & )  
TITANIUM COMPANY, LTD.; PANGANG )  
GROUP TITANIUM INDUSTRY )  
COMPANY, LTD; and PANGANG GROUP )  
INTERNATIONAL ECONOMIC & )  
TRADING COMPANY, )  
Defendants. )

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The parties have met and conferred regarding proposed trial dates and pretrial deadlines after the Mandate issued from the Ninth Circuit Court of Appeals (Dkt. No. 50, Case No. 19-10306). The parties jointly propose the following dates:

1. Tuesday, March 15, 2021:

- a. Government to disclose Trial Witnesses and Exhibits;
- b. Government disclosure of *Jencks* and *Giglio* Materials; and
- c. Government Disclosure of Experts and Expert Reports.

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- 1       2. Friday, April 15, 2022: Defense Disclosure of Experts and Expert Reports.
- 2       3. Friday, April 29, 2022: *Daubert* and *In Limine* Motions.
- 3       4. Friday, May 13, 2022: *Daubert* and *In Limine* Responses.
- 4       5. Friday, May 27, 2022: *Daubert* Replies (no *In Limine* Replies).
- 5       6. Friday, June 6, 2021: Pretrial Filings.
- 6       7. Monday, June 20, 2022 2:00 p.m.: Final Pretrial Conference.
- 7       8. Monday, July 11, 2022: Jury Selection and Trial.

With respect to the proposed July 11, 2022 trial date, the parties note for the Court's advance consideration two points that influenced this proposal: (i) lead counsel for the government will be on extended personal leave from late December 2021 until at least late March 2022, and (ii) the case agent is expected to be in trial for approximately six weeks beginning February 14, 2022. Based on those factors, and, in addition, the considerable difficulties for the defense in preparing for trial during the pandemic given the location of the defendants, the defense will stipulate to an appropriate Speedy Trial exclusion. The proposed July 11 trial date will accommodate the aforesaid periods of unavailability and trial preparation challenges.

The parties specifically reserve the following issues, which could not be resolved during the meet-and-confer and will be the subject of further meet and confer efforts: When the Defense must produce an Exhibit List, Witness List, and Rule 16(b) material and 26.2 witness statements, and whether the Defense deadlines should fall later than the Government's pretrial deadlines.

The parties will appear as ordered at the next status conference, currently scheduled for October 5, 2021, to address pretrial and trial dates and any other matters.

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1 STEPHANIE M. HINDS  
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*/s/ Colin C. Sampson*  
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September 28, 2021.

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